



From: PAUL STEADMAN
To: COZZI SITES REMEDIATION TEAM
Date: 3/10/99 4:03pm
Subject: COZZI SITES STATUS MEETING OF 10 MARCH 1999

Good afternoon, Cozzi Team Members

A meeting was held today at 1:30 pm in ORC Conference Room # 1310A for purposes of determining violations (federal, state & City of Chicago), status of inspection / sampling efforts at the varied Cozzi sites throughout the Chicagoland area, and, from a multi-media approach, what support and assistance the Emergency Response Branch (ERB) may provide in an effort to bring these facilities into compliance. The purpose of this message is to assure that ERB has clarification on specific inputs it will give in the Cozzi facilities remediation efforts.

Copies of the Cometco Oil Facility START letter report of the ERB site assessment conducted in November 1998 were provided to ORC's Sherry Estes, RCRA representative George Opek, and TSCA representative Kenneth Zolnierczyk. Howard Duckman of the Water Division, who was not in attendance at this meeting, and Gino Bruni, Illinois EPA, who attended this meeting telephonically, will both receive copies of this report presently.

OSC Steadman pointed out during the distribution of these documents that no SPCC Plan was necessary at this facility (250 gallons of oil storage for equipment and devices used on the premises) and that, based on the analytical results of the varied media sampled provided in this report, that sufficient basis for CERCLA or OPA response action was not in evidence for the Cometco facility. Further, no need for "core sampling" of the lagoon sludge was indicated.

ERB, through OSC Steadman, will conduct a full Spill Prevention, Control and Countermeasures (SPCC) Plan inspection at the Cozzi facility located at 2500 South Paulina Avenue in Chicago, Illinois by the week of April 12, 1999. George Opek will provide OSC Steadman with a list of the violations noted by RCRA as guidance for the inspection.

OSC Steadman will determine the status and contents of the "Clarifier" unit at the South Ewing Avenue facility before or during the week of 12 April 1999. No SPCC inspection is required at this facility according to Ken Zolnierczyk. Sampling of the inactive (over 3 years) sedimentation facility will be done to determine whether PCBs, oil, and/or TCLP metals are present in the sludges in the bottom quarter portion of this tank.

None of the remaining six Cozzi facilities will require SPCC Plan inspections or investigations or require further ERB participation either technically or financially.

Superfund Technical Assistance and Removal Team (START) technical direction documents (TDDs) and analytical directives will be prepared for the above activities and efforts during the interim.

The question was raised on how a multi-media enforcement/information request is moved

through the varied offices and divisions for appropriate sign-off. It is believed that Branch Chief authority as signatory is sufficient.

The next meeting of the Cozzi Team is scheduled for the week of April 12, 1999.

The above discussion is the OSC's understanding of ERB and Superfund Division involvement for the Cozzi facilities now under the ownership of Metals Management, Inc. If there are any errors or omissions, please correct me upon receipt of this e-mail report.

Thanks,

-Paul Steadman (#3-7615)

CC: NACHOWICZ-LINDA, KUSH-BEVERLY, CARNEY-WENDY